

**KENNETH M. SEATON d/b/a,
GRAND RESORT HOTEL AND
CONVENTION CENTER**

V.

Defendant.

JURY DEMAND

- (a) TripAdvisor, both at the time of filing of the Civil Action and as of the date of filing of this Notice, was and is a limited liability company organized under the laws of the State of Delaware with its principal place of business in the State of Massachusetts.
- (b) TripAdvisor, both at the time of filing of the Civil Action and as of the date of this Notice, is a wholly-owned subsidiary of TripAdvisor Holdings, LLC, a Massachusetts LLC. TripAdvisor Holdings, LLC is a wholly-owned subsidiary of Expedia, Inc., a Delaware corporation, with its principal place of business in Washington. Expedia, Inc. is a publicly traded corporation.
- (c) Kenneth M. Seaton, upon information and belief, both at the time of filing of the Civil Action and as of the date of filing this Notice, was and is a citizen of the United States of America domiciled in the State of Tennessee.
- (d) Jurisdiction exists among all parties properly joined in the civil action in that it is between citizens of different States, and the amount in controversy exceeds \$75,000, exclusive of interest and costs.
- (e) This action is within the original jurisdiction of the Court pursuant to the provisions of 28 U.S.C. § 1332.

5. TripAdvisor has filed this Notice prior to the expiration of thirty (30) days following its receipt of a copy of the Complaint.

6. The judicial district and division of this Court embraces Sevier County, Tennessee, the place where the Civil Action is pending.

7. TripAdvisor will give written notice to plaintiff and will file a Notice of Filing of Notice of Removal with the Clerk of the Circuit Court of Sevier County, Tennessee.

TripAdvisor attaches a copy of the Notice of Filing of Notice of Removal as Exhibit B.

WHEREFORE, defendant, TripAdvisor, LLC prays that the Civil Action now pending against it in the Circuit Court of Sevier County, Tennessee, be removed therefrom to this Court.

Respectfully submitted,

s/ S. Russell Headrick
S. Russell Headrick (BPR No. 005750)
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& Berkowitz
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Attorneys for TripAdvisor, LLC

Of counsel:

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New York, New York 10019

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing Notice of Removal has been filed electronically and has been served upon the following parties in interest herein by mailing same to the offices of said parties in interest by United States Mail with sufficient postage thereon to carry the same to its destination.

John T. Milburn Rogers
100 S. Main Street
Greeneville, Tennessee 37744

Sidney Gilreath
550 Main Avenue, Suite 600
Knoxville, Tennessee 37902

This 17th day of November, 2011.

s/ S. Russell Headrick
S. Russell Headrick